UNITED STATES DISTRICT COURT DISTRICT OF SOUTH CAROLINA CHARLESTON DIVISION

)
)
)
)
) C/A No. 2:15-134-RMG
)
)
) PLAINTIFFS' CONSENT
) TO MEDIATION AND A
) LIMITED STAY
)
)
)
)
)
)
)

Pursuant to the Court's March 30, 2015 Order (Dkt. No. 21), Plaintiffs are willing to enter into mediation with the objective of seeking a resolution of this dispute through a negotiated settlement.

Given the importance and urgency of the issues at stake for the Named Plaintiffs and all children in foster care, Plaintiffs would agree to a brief initial stay that is limited to 30 days.

In addition and pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Plaintiffs consent to correction of the previous caption.

Respectfully submitted:

/s/Matthew T. Richardson

MATTHEW T. RICHARDSON, Federal Bar

#7791

WYCHE P.A.

801 Gervais Street, Suite B

Columbia, SC 29201

Telephone: (803) 254-6542 Facsimile: (803) 254-6544

Email: mrichardson@wyche.com

IRA LUSTBADER (pro hac vice) KATHRYN A. WOOD (pro hac vice)

CHILDREN'S RIGHTS

330 Seventh Avenue, Fourth Floor

New York, New York 10001 Telephone: 212-683-2210

Facsimile: 212-683-4015

Email: <u>ilustbader@childrensrights.org</u>;

kwood@childrensrights.org

SUSAN BERKOWITZ, Federal Bar #1305 STEPHEN SUGGS, Federal Bar #7525 SOUTH CAROLINA APPLESEED LEGAL JUSTICE CENTER

P.O. Box 7187

Columbia, S.C. 29202

Telephone: (803) 779-1113 Facsimile: (803) 779-5951 Email: sberk@scjustice.org;

ssuggs@scjustice.org